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March 26, 2018

The Honorable James Orenstein  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, NY 1121

**VIA ECF**

Re: *In re Payment Card Interchange Fee and Merchant Discount Antitrust Litigation*  
Case No. 1:05-MD-1720 (MKB)(JO)

Dear Judge Orenstein:

On March 20, 2018, Defendant Mastercard submitted a letter motion seeking a protective order limiting the upcoming April 20, 2018 deposition of Mastercard's CEO, Ajay Banga, to no more than four hours [DK7170]. On March 22, 2018 Your Honor directed Plaintiffs and Defendants "to continue to confer in an effort to resolve the matter on consent." We have continued to confer and the Plaintiffs have made a proposal to Mastercard which we hope will resolve the dispute. Plaintiffs are hopeful that Mastercard will accept our proposal, however, Mr. Gallo has informed us that Mastercard cannot respond to our proposal until tomorrow. Mr. Gallo has agreed to an extension until March 28 for Plaintiffs' joint response. In the event that we are unable to resolve the dispute, Plaintiffs respectfully request an extension until March 28, 2018 to submit our response to Mastercard's motion.

Very truly yours,

*s/ K. Craig Wildfang*  
K. Craig Wildfang

cc: Counsel of Record (Via ECF)

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